

LATHAM & WATKINS LLP  
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*Attorneys for Respondent Latham & Watkins  
LLP*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

In re BANC OF CALIFORNIA  
SECURITIES LITIGATION

CASE NO. 8:17-cv-00118-DMG (DFMx)

CLASS ACTION

This Document Relates To:  
ALL ACTIONS.


**DECLARATION OF NATHAN M.  
SAPER IN SUPPORT OF LATHAM &  
WATKINS LLP'S PARTIAL  
OPPOSITION TO NONPARTY MUDDY  
WATERS CAPITAL LLC'S REQUEST  
TO SET AMOUNT OF ATTORNEYS'  
FEES**

1 I, Nathan M. Saper, hereby declare and state as follows:

2 1. I am a member of the State Bar of California. I am an attorney with the  
3 law firm of Latham & Watkins LLP ("Latham"), counsel to Latham in this matter.  
4 I have personal knowledge of all the matters referred to herein and, if called upon to  
5 do so, could and would competently testify truthfully with respect thereto. I make  
6 this declaration in support of Latham's Partial Opposition To Nonparty Muddy  
7 Waters Capital LLC's ("Muddy Waters") Request To Set Amount Of Attorneys'  
8 Fees.

9 2. Attached hereto is **Exhibit 1**, which is a chart I created based on my  
10 review of (a) the Declaration of Dylan A. Esper and Exhibits A–M thereto, (b) the  
11 Declaration of Patrick Strawbridge and Exhibits A–H thereto, and (c) the  
12 Declaration of Ambika Kumar and Exhibit C thereto. I have listed the entries in  
13 each Exhibit or Declaration as to which Latham opposes Muddy Waters' request for  
14 fees, those that Latham does not oppose, and the totals for each.

15  
16 I declare under penalty of perjury under the laws of the United States that the  
17 foregoing is true and correct. Executed on November 4, 2024 at Los Angeles,  
18 California.

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22 \_\_\_\_\_  
23 Nathan M. Saper  
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# **Exhibit 1**

Invoice / Time Entry	Amount	Opposed	Amount Opposed	Amount Not Opposed
<b>Esper Declaration</b>				
June 2023 Invoice (Ex. A)	\$ 58,297.15	No		\$ 58,297.15
July 2023 Invoice (Ex. B)	\$ 28,575.00	No		\$ 28,575.00
August 2023 Invoice (Ex. C)	\$ 25,435.19	No		\$ 25,435.19
September 2023 Invoice (Ex. D)	\$ 29,632.85	No		\$ 29,632.85
October 2023 Invoice (Ex. E)	\$ 74,440.67	Yes in part		
- 10/23			\$ 2,075.00	
- 10/24			\$ 3,925.00	
- 10/25			\$ 5,787.00	
- 10/26			\$ 3,925.00	
- 10/27			\$ 1,312.50	
- 10/30			\$ 1,912.50	
- 10/31			\$ 1,125.00	\$ 54,378.67
November 2023 Invoice (Ex. F)	\$ 56,652.05	Yes in part		
- 11/1			\$ 850.00	
- 11/7			\$ 1,487.50	
- 11/8			\$ 1,650.00	
- 11/10			\$ 1,062.50	
- 11/14			\$ 1,275.00	
- 11/15			\$ 1,275.00	
- 11/20			\$ 425.00	\$ 48,627.05
December 2023 Invoice (Ex. G)	\$ 21,917.69	No		\$ 21,917.69
January 2024 Invoice (Ex. H)	\$ 6,800.00	Yes	\$ 6,800.00	0
February 2024 Invoice (Ex. I)	\$ 4,125.00	Yes	\$ 4,125.00	0
March 2024 Invoice (Ex. J)	\$ 425.00	Yes	\$ 425.00	0
May 2024 Invoice (Ex. K)	\$ 2,250.00	Yes in part		
- 5/1			\$ 187.50	
- 5/9			\$ 375.00	
- 5/10			\$ 1,312.50	\$ 375.00
June 2024 Invoice (Ex. L)	\$ 7,987.50	Yes	\$ 7,987.50	0
July 2024 Invoice (Ex. M)	\$ 5,429.35	Yes	\$ 5,429.35	0
Time Spent Preparing Esper Decl.	\$ 9,000.00	No		\$ 9,000.00
<b>TOTAL</b>	<b>\$ 330,967.45</b>		<b>\$ 54,728.85</b>	<b>\$ 276,238.60</b>
<b>Strawbridge Declaration</b>	\$ 136,840.48	Yes	\$ 136,840.48	0
<b>Kumar Declaration</b>	\$ 691,943.84	Yes	\$ 691,943.84	0
<b>TOTAL</b>	<b>\$ 828,784.32</b>		<b>\$ 828,784.32</b>	<b>0</b>